

APRIL L. HOLLINGSWORTH (Bar No. 9391)  
**HOLLINGSWORTH LAW OFFICE, LLC**  
1881 South 1100 East  
Salt Lake City, Utah 84105  
Telephone: 801-415-9909  
april@aprilhollingsworthlaw.com  
Attorneys for Plaintiff

**IN THE UNITED STATES DISTRICT  
COURT DISTRICT OF UTAH, CENTRAL  
DIVISION**

<p><b>JUDITH PINBOROUGH ZIMMERMAN, Ph. D.,</b></p> <p>Plaintiff,</p> <p>vs.</p> <p><b>THE UNIVERSITY OF UTAH, and WILLIAM MCMAHON, in his official and individual capacities,</b></p> <p>Defendants.</p>	<p><b>DECLARATION OF ELIZABETH M. PECK</b></p> <p>Case No. 2:13-cv-1131</p> <p>Judge Jill Parrish Magistrate Judge Brooke Wells</p>
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I, Elizabeth Peck, under penalty of perjury, hereby declare and testify as follows:

1. I am an attorney who has been licensed to practice in all of the state and federal courts of the State of Utah since October 1992. I am also licensed to practice in California, having been admitted to the California Bar in 2011. Although I still practice in Utah on a case-by-case basis, I recently closed my Utah office as I now work almost exclusively in and from my California office. In California, my rate is currently \$675/hr., and I was previously approved earlier in 2018 by the Santa Cruz Superior Court for the state of California at \$650/hour.

2. I have practiced employment law since 1992, have an active Bar license in both Utah and California. I have practiced exclusively in the area of plaintiff's employment law since 1998.

3. I am familiar with the rates being charged by attorneys who are practicing in the area of employment law in both Utah and California. For instance, in 2008, Judge Kimball approved me at a rate of \$215/hr. In 2017, I was approved by Judge Petit of the Third Judicial District Court, in and for Summit County, state of Utah, at a rate of \$325/hr. for work I had done in 2016 and prior. Since then, my Utah rate has increased to its current rate of \$375.

4. In 2011, I was named the "Employment Lawyer of the Year" by the Labor and Employment Section of the Utah State Bar; I also was recently selected as a national finalist for the *National Law Journal's* Elite Trial Lawyer of 2018 in the area of gender discrimination.

5. In regards to this case, I understand that the billing rate of April Hollingsworth, counsel for Dr. Zimmerman, is \$375/hour.

6. I am aware that April Hollingsworth graduated from law school in 1996, and has been practicing employment law in Utah since 2002. I am also aware that she was named "Employment Lawyer of the Year" in 2015 by the Labor and Employment Section of the Utah State Bar.

7. I am very familiar with Ms. Hollingsworth's work as I have partnered with her on multiple employment law cases, including two successful jury trials and a successful bench trial.

8. Ms. Hollingsworth charges an hourly rate which, in my experience, is within the average community standards for hourly rates for attorneys of her experience and skill in the area of employment and labor law.

9. Based upon my experience practicing employment law in this community, and my knowledge of the billing rates in this community, I believe that her billing rate is reasonable and in line with her experience and expertise.

DATED this 17th day of September, 2018.

/s/ Elizabeth M. Peck  
Elizabeth M. Peck  
**PECK-LAW**  
*Original maintained in offices of  
Hollingsworth Law Office*